

1 EDMUND G. BROWN JR.
Attorney General of California
2 ALFREDO TERRAZAS
Senior Assistant Attorney General
3 ARTHUR D. TAGGART
Supervising Deputy Attorney General
4 State Bar No. 083047
1300 I Street, Suite 125
5 P.O. Box 944255
Sacramento, CA 94244-2550
6 Telephone: (916) 324-5339
Facsimile: (916) 327-8643
7 *Attorneys for Complainant*

8 **BEFORE THE**
9 **BOARD OF REGISTERED NURSING**
10 **DEPARTMENT OF CONSUMER AFFAIRS**
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. **2010-591**

13 **ROSA ALEXANDERS GILBERT, aka**
14 **RODI TSITIRIDOU, aka**
15 **ROSA ALEXANDROS TSITIRIDOU GILBERT, aka**
16 **ROSA ALEX GILBERT**
17 **227 Gilbert Ct.**
18 **Florence, AL 35630**

A C C U S A T I O N

19 **Registered Nurse License No. 662848**

Respondent.

20 Complainant alleges:

PARTIES

21 1. Louise R. Bailey, M.Ed., RN ("Complainant") brings this Accusation solely in her
22 official capacity as the Interim Executive Officer of the Board of Registered Nursing, Department
23 of Consumer Affairs.

License History

24 2. On or about August 5, 2005, the Board of Registered Nursing issued Registered
25 Nurse License Number 662848 to Rosa Alexanders Gilbert, also known as Rodi Tsitiridou,
26 Rosa Alexandros Tsitiridou Gilbert, and Rosa Alex Gilbert ("Respondent"). The license expired
27 on July 31, 2007, and has not been renewed.
28

JURISDICTION

3. This Accusation is brought before the Board of Registered Nursing ("Board"), Department of Consumer Affairs, under the authority of the following laws. All section references are to the Business and Professions Code ("Code"), unless otherwise indicated.

4. Code section 2750 provides, in pertinent part, that the Board may discipline any licensee, including a licensee holding a temporary or an inactive license, for any reason provided in Article 3 (commencing with Code section 2750) of the Nursing Practice Act.

5. Code section 2764, in pertinent part, that the expiration of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the licensee or to render a decision imposing discipline on the license. Under Code section 2811, subdivision (b), the Board may renew an expired license at any time within eight years after the expiration.

6. Code section 118, subdivision (b), provides that the suspension, expiration, surrender, or cancellation of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary action during the period within which the license may be renewed, restored, reissued or reinstated.

STATUTORY PROVISIONS

7. Code section 2761 states, in pertinent part:

The board may take disciplinary action against a certified or licensed nurse or deny an application for a certificate or license for any of the following:

(a) Unprofessional conduct, which includes, but is not limited to, the following:

(4) Denial of licensure, revocation, suspension, restriction, or any other disciplinary action against a health care professional license or certificate by another state or territory of the United States, by any other government agency, or by another California health care professional licensing board. A certified copy of the decision or judgment shall be conclusive evidence of that action.

COST RECOVERY

8. Code section 125.3 provides, in pertinent part, that the Board may request the administrative law judge to direct a licensee found to have committed a violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

1 CAUSE FOR DISCIPLINE

2 (Out-of-State Discipline)

3 9. Respondent's license is subject to disciplinary action under Code section 2761,
4 subdivision (a)(4), on the grounds of unprofessional conduct, in that Respondent's Registered
5 Nurse Licenses were disciplined by the State Boards of Nursing, as follows:

6 Alabama State Board of Nursing ("Alabama Board")

7 a. In the action entitled, *In the Matter of Rosa Alexandros Tsitiridou Gilbert, Alabama*
8 *License No. 1-092848, ABN Case Number 2008-0263*, effective May 16, 2008, Respondent was
9 issued a Public Reprimand and must provide all health care employers with a copy of the Order.

10 The circumstances of the public reprimand are that Respondent failed to comply with the
11 Alabama Nurse Practice Act and its rules and regulations, failed to practice in accordance with
12 the standards of practice adopted by the Board, and failed to exercise appropriate nursing
13 judgment when she exchanged phone numbers with a patient and communicated with the patient
14 and family when not acting in her nursing role, and when she communicated with other patients
15 and/or their families when not acting in her nursing role, in violation of the Alabama Board of
16 Nursing Administrative Code.

17 A copy of the Consent Order, Findings of Fact, Conclusions of Law, and Final Order are
18 attached as Exhibit A, and are incorporated herein.

19 Florida Department of Health, Florida Board of Nursing ("Florida Board")

20 b. In the action entitled, *Department of Health, Petitioner, vs. Rosa Alex Gilbert,*
21 *Respondent, License No. RN 9260431, Case No. 2008-14294*, effective April 28, 2009, pursuant
22 to a Final Order, Respondent's Florida Registered Nurse License No. RN 9260431 was placed on
23 two years probation with terms and conditions based upon the public reprimand taken by the
24 Alabama State Board of Nursing.

25 A copy of the Settlement Agreement, Stipulated Facts and Final Order are attached as
26 Exhibit B and are incorporated herein.

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1 PRAYER

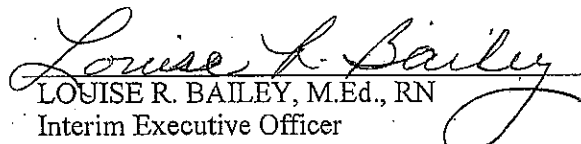
2 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
3 and that following the hearing, the Board of Registered Nursing issue a decision:

4 1. Revoking or suspending Registered Nurse License Number 662848 issued to
5 Rosa Alexanders Gilbert, also known as Rodi Tsitiridou, Rosa Alexandros Tsitiridou Gilbert, and
6 Rosa Alex Gilbert;

7 2. Ordering Rosa Alexanders Gilbert, also known as Rodi Tsitiridou, Rosa Alexandros
8 Tsitiridou Gilbert, and Rosa Alex Gilbert, to pay the Board the reasonable costs of the
9 investigation and enforcement of this case, pursuant to Code section 125.3; and,

10 3. Taking such other and further action as deemed necessary and proper.

11
12 DATED: 5/17/10


LOUISE R. BAILEY, M.Ed., RN
Interim Executive Officer
Board of Registered Nursing
Department of Consumer Affairs
State of California
Complainant

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EXHIBIT A

BEFORE THE ALABAMA BOARD OF NURSING

IN THE MATTER OF:

ROSA ALEXANDROS TSITIRIDOU GILBERT

LICENSE NO. 1-092848

Respondent.

ABN CASE NO. 2008-0263

CONSENT ORDER

The Alabama Board of Nursing, hereinafter referred to as Board, having evidence that ROSA ALEXANDROS TSITIRIDOU GILBERT, hereinafter referred to as Respondent, is in violation of the Code of Alabama 1975, § 34-21-25, and of the Alabama Board of Nursing Administrative Code, § 610-X-8; and Respondent, desiring to avoid the necessity of a formal hearing, do hereby enter into this Consent Order in lieu of proceeding with further disciplinary action. Respondent understands the right to a formal hearing in this matter and hereby knowingly waives such right. Respondent further understands and agrees that this is a non-appealable Order.

FINDINGS OF FACT

I.

On July 17, 2000, Respondent was licensed by the Alabama Board of Nursing as a Registered Nurse and was so licensed at all times relevant to matters stated herein. Respondent is currently licensed through December 31, 2008.

II.

On July 19, 2001, the Alabama Board of Nursing issued an Order which suspended Respondent's license for a period of nine (9) months and provided for reinstatement of

licensure on a probationary status for a period of twenty-four (24) months. This action was due to Respondent's intravenous administration of Imodium AD contrary to the ordered oral route of administration, and Respondent's failure to document and report her actions. On April 23, 2002, Respondent's license was reinstated on probation and on May 24, 2004, Respondent completed the terms of her Order.

III.

Respondent has been licensed to practice as a Registered Nurse in the State of Florida and the State of California. Respondent's Florida license is current through July 31, 2008. Respondent's California license expired on July 31, 2007.

IV.

Between April 1, 2007 and July 2, 2007, Respondent was employed by Advance Placement Agency, Clearview, Florida, as a contract RN at Bayfront Medical Center, St. Petersburg, Florida.

V.

On July 2, 2007, Bayfront Medical Center notified Advance Placement Agency that they did not wish to have Respondent back at their facility following an investigation of Respondent's relationship with a 19-year-old quadriplegic patient. The patient acknowledged to his health care provider that he had a friendly consensual relationship with the Respondent and was upset that the Respondent no longer wanted anything to do with him.

VI.

On January 15, 2008, Respondent acknowledged in a written statement:

- She had exchanged phone numbers with a 19-year-old quadriplegic patient of Bayfront Medical Center.

- She had communicated with the 19-year-old quadriplegic patient and his parents occasionally.
- She denied inappropriate activity between herself and the patient.
- While providing care to this patient, a male co-worker with whom Respondent had a personal relationship alleged the patient's cell phone accidentally fell onto the floor and landed open. The male co-worker discovered Respondent's name and cell phone number while reviewing the contact names and text messaging contained on the patient's cell phone.
- She has maintained contact with some of her past patients and their families.

CONCLUSIONS OF LAW

1. Code of Alabama 1975 § 34-21-1(3)(a) defines the practice of professional nursing as "any act in the care and counseling of persons or in the promotion and maintenance of health and prevention of illness and injury based upon the nursing process which includes systematic data gathering, assessment, appropriate nursing judgment and evaluation of human responses to actual or potential health problems."
2. Alabama Board of Nursing Administrative Code § 610-X-6-.02(6) and (9) requires the Registered Nurse to accept individual responsibility and accountability for judgments and actions and respect the dignity and rights of patients and their significant others including freedom from exploitation of physical and mental boundaries.
3. Respondent failed to comply with the Alabama Nurse Practice Act and its rules and regulations, failed to practice in accordance with the standards of practice adopted by the Board, and failed to exercise appropriate nursing judgment when she exchanged phone numbers with a patient and communicated with the patient and

family when not acting in her nursing role, and when she communicated with other patients and/or their families when not acting in her nursing role. Said conduct is unprofessional conduct of a character likely to deceive, defraud, or injure the public in matters pertaining to health in violation of Code of Alabama 1975, § 34-21-25 and Alabama Board of Nursing Administrative Code § 610-X-8.03(6)(a), (b), and (f)(i).

4. Respondent violated professional boundaries of the nurse-patient relationship through emotional exploitation of a patient and inappropriate personal disclosures to patients and patients' family members when she exchanged personal phone numbers with a patient, communicated with the patient and his family when not acting in a nursing role, and then ended the personal relationship, which resulted in the patient becoming upset; and when she communicated with other patients and/or their family members when not acting in her nursing role. Such conduct is unprofessional conduct of a character likely to deceive, defraud, or injure the public in matters pertaining to health in violation of Code of Alabama 1975, § 34-21-25 and Alabama Board of Nursing Administrative Code § 610-X-8.03(6)(p)(ii)(iii).
5. Respondent exhibited inappropriate or unprofessional conduct or behavior in the workplace when she exchanged personal phone numbers with a patient and communicated with patients and/or their family members when not acting in a nursing role. Such conduct is unprofessional conduct of a character likely to deceive, defraud, or injure the public in matters pertaining to health in violation of Code of Alabama 1975, § 34-21-25 and Alabama Board of Nursing Administrative Code § 610-X-8.03(6)(q).

ORDER

Respondent's Alabama Registered Nurse License, No. 1-092848, is hereby disciplined pursuant to the following terms and conditions:

1. Public Reprimand

Respondent is issued a **PUBLIC REPRIMAND** from the Board for the conduct stated herein.

2. Fine

Respondent shall pay a fine in the amount of \$300. This fine must be paid within thirty (30) days of the effective date of this Order. Respondent understands that failure to pay the fine is cause for additional disciplinary action by the Board of Nursing.

3. Employment - Notification

Respondent shall provide all health care employers, collaborative and covering physicians (if CRNP/CNM) and schools of nursing with a copy of this Order and cause each to acknowledge to the Board that a copy of this Order has been provided to them. Said notification shall be received by the Board no later than ten (10) days after the effective date of this Order or within ten (10) days of Respondent's employment or advanced practice approval or entry into school and must be on the Board-provided form.

4. Public Information

This Order is public information. All disciplinary actions of the Board will be reported to all required data banks.

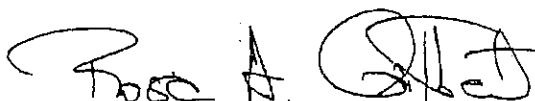
5. Effective Date

The effective date of this Order shall be the documented date of service or attempted service by certified mail or personal service.

6, Final Order

This Order is subject to full Board consideration and acceptance before it shall be final.

EXECUTED on this the 10th day of April 2008.



ROSA ALEXANDROS TSITIRIDOU GILBERT

APPROVED AND ACCEPTED by the ALABAMA BOARD OF NURSING on this the 16th
day of May 2008.



N. GENELL LEE, RN, MSN, JD
EXECUTIVE OFFICER
ALABAMA BOARD OF NURSING

EXHIBIT B

**STATE OF FLORIDA
DEPARTMENT OF HEALTH**

DEPARTMENT OF HEALTH,

Petitioner,

v.

CASE NO.: 2008-14294

ROSA ALEX GILBERT, R.N.,

Respondent.

SETTLEMENT AGREEMENT

Pursuant to Section 120.57(4), Florida Statutes, the above named parties hereby offer this Agreement to the Board of Nursing as disposition of the Administrative Complaint, attached hereto as Exhibit "A", in lieu of any other administrative proceedings. The terms herein become effective only if and when a Final Order accepting this Agreement is issued by the Board and filed. In considering this Agreement, the Board may review all investigative materials regarding this case. If this Agreement is rejected, it, and its presentation to the Board, shall not be used against either party.

STIPULATED FACTS

1. Respondent is a **REGISTERED NURSE** in the State of Florida holding license number **RN 9260431**.
2. The Respondent is charged by an Administrative Complaint filed by the Department and properly served upon Respondent with violations of Chapters 456

and/or 464, Florida Statutes. A true and correct copy of the Administrative Complaint is attached hereto and incorporated by reference as Exhibit A.

3. Respondent neither admits nor denies the factual allegations contained in the Administrative Complaint.

STIPULATED LAW

1. Respondent admits that he/she is subject to the provisions of Chapters 456 and 464, Florida Statutes, and the jurisdiction of the Department and the Board.

2. Respondent admits that the stipulated facts, if proven true, constitute violations of laws as alleged in the Administrative Complaint.

3. Respondent admits that the Agreement is a fair, appropriate and reasonable resolution to this pending matter.

PROPOSED DISPOSITION

1. The Board of Nursing shall reprimand the license of the Respondent.

2. The Respondent must pay an administrative fine in the amount of **TWO HUNDRED FIFTY DOLLARS (\$250.00)** and investigative costs not to exceed **ONE THOUSAND FIVE HUNDRED FIVE DOLLARS AND FORTY NINE CENTS (\$1,505.49)** within **TWO (2) YEARS** from the date of entry of the Final Order. However, if the Respondent is in the Intervention Project for Nurses (IPN), the payment is due **prior** to completion of IPN. If the Respondent's license is suspended by the terms of this agreement, the payment is due **prior** to the application for reinstatement of the license. If the Respondent is placed on probation, the payment is due **prior** to the completion of the probationary period. The Respondent has the responsibility to

document financial hardship prior to the due date of the payment. Payment must be by money order. Partial payments shall be accepted. Payment shall be made to the Board of Nursing and mailed to, DOH-Client Services, P.O. Box 6320, Tallahassee, Florida 32314-6320, Attention: Nursing Compliance Officer.

3. The license of **ROSA ALEX GILBERT, R.N.**, is placed on probation for 2 year(s) subject to the following conditions:

- a. The Respondent shall not violate Chapter 456 or 464, Florida Statutes, the rules promulgated pursuant thereto, any other state or federal law, rule, or regulation relating to the practice or the ability to practice nursing. Violation of an order from another state/jurisdiction shall constitute grounds for violation of the Board Order adopting this Agreement.
- b. The Respondent must report any change in his/her address, telephone number, employment, employer's address or telephone number, or any arrests [or violations of probation or whatever impediment which may be on the license from another jurisdiction], in writing by certified mail within five (5) working days to the Nursing Compliance Officer at the Department of Health, Client Services Unit, HMOAMS, BIN # C01, 4052 Bald Cypress Way, Tallahassee, Florida 32399-3251.
- c. Whether employed as a nurse or not, the Respondent shall submit written reports to the Nursing Compliance Officer at the address provided in the previous paragraph, which contain the Respondent's name; license number; current address; current telephone number; the name, address, and telephone number of each current employer, whether employed as a nurse or not; and a statement by the Respondent describing his/her employment. This report shall be submitted to the Nursing Compliance Officer every three (3) months in a manner as directed by the Nursing Compliance Officer.
- d. All current and future settings in which the Respondent practices nursing shall be promptly informed of the

Respondent's probationary status. Within five (5) days of the receipt of the Order adopting this Agreement, the Respondent shall furnish a copy to his/her nursing supervisor or supervisors, if there are multiple employers. The supervisor(s) must acknowledge this probation to the Board compliance officer in writing on employer letterhead within ten (10) days. Should the Respondent change employers, he/she must supply a copy of the Order adopting this Agreement to his/her supervisor within five (5) days. The new employer shall acknowledge the probation in writing on employer letterhead to the Board compliance officer within ten (10) days. The Respondent shall be responsible for assuring reports from the nursing supervisors will be furnished to the Nursing Compliance Officer every three (3) months. That report shall describe the Respondent's work assignment, workload, level of performance, and any problems that have occurred during that quarter. Any report indicating an unprofessional level of performance shall constitute a violation of this probation.

- e. If the Respondent leaves Florida for thirty (30) days or more or ceases to practice nursing in Florida, the term of probation shall be tolled until the Respondent returns to active practice of nursing in Florida. Then the probationary period will resume. Unless the Final Order adopting this Settlement Agreement expressly states otherwise, any and all fines and costs imposed, or continuing education required, are not tolled by this provision, and must be paid or completed within the time specified. Employer reports are not required during the time probation is tolled. Working in nursing without notification to the Board is a violation of this Order.

4. The Respondent's failure to comply with the terms of this Probation without the prior written consent of the Board of Nursing shall be a violation of this Probation. The probation shall not be terminated until the Respondent has complied with all terms of probation. The failure to comply with the terms of probation set forth above shall result in a subsequent Uniform Complaint Form being filed by the Board

with the Department of Health against the Respondent's license, which may result in additional administrative fines, probationary periods, and/or suspensions being imposed against the Respondent's license. The Respondent shall pay all costs necessary to comply with the terms of this Order. Such costs include, but are not limited to, the cost of preparation of investigative and probationary reports detailing the compliance with this probation; the cost of obtaining, and analysis of, any blood or urine specimens submitted pursuant to this Order; and administrative costs directly associated with the Respondent's probation.

5. The terms of the Final Order are effective as of the date the Final Order is filed with the clerk for the Department of Health. The Board office will send the Respondent information regarding probationary terms; however, failure of the Respondent to receive such information does not excuse compliance with the terms of the Final Order.

6. The Respondent shall not violate Chapter 456 or 464, Florida Statutes, the rules promulgated pursuant thereto, any other state or federal law, rule, or regulation relating to the practice or the ability to practice nursing. Violation of an order from another state/jurisdiction shall constitute grounds for violation of the Board Order adopting this Agreement.

7. It is expressly understood that this Agreement is subject to the approval of the Board and Department and has no force and effect until an Order is entered adopting the Agreement.

8. This Agreement is executed by the Respondent for the purpose of avoiding further administrative action by the Board of Nursing regarding the acts or omissions specifically set forth in the Administrative Complaint attached hereto. In this regard, Respondent authorizes the Board to review and examine all investigative file materials concerning Respondent prior to, or in conjunction with, consideration of the Agreement. Furthermore, should this joint Agreement not be accepted by the Board, it is agreed that presentation to, and consideration of, this Agreement and other documents and matters by the Board shall not unfairly or illegally prejudice the Board or any of its members from further participation, consideration or resolution of these proceedings. Respondent shall offer no evidence, testimony or argument that disputes or contravenes any stipulated fact or conclusion of law.

9. Respondent and the Department fully understand that this joint Agreement and subsequent Final Order incorporating same will in no way preclude additional proceedings by the Board and/or Department against the Respondent for acts or omissions not specifically set forth in the Administrative Complaint attached hereto. This Agreement relates solely to the current disciplinary proceedings arising from the above-mentioned Administrative Complaint and does not preclude further action by other divisions, departments, and/or sections of the Department, including but not limited to the Agency for Health Care Administration's Medicaid Program Integrity Office.

10. The Respondent waives the right to seek any attorney's fees or costs from the Department in connection with this disciplinary proceeding.

11. Respondent waives all rights to appeal and further review of this Agreement and these proceedings.

WHEREFORE, the parties hereto request the Board to enter a Final Order accepting and implementing the terms contained herein.

SIGNED this 25 day of January, 2008.



ROSA ALEX GILBERT, R.N.

Before me personally appeared Rosa Gilbert whose identity is known to be by DL + Personal Knowledge (type of identification), and who under oath, acknowledges that his/her signature appears above.

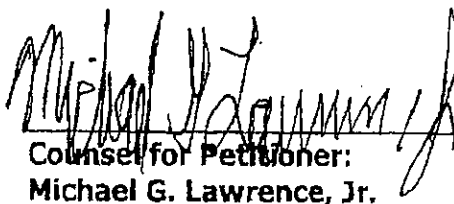
Sworn to and subscribed by Respondent before me this 25 day of January, 2008.


Notary Public

My Commission Expires: 2/2/11

APPROVED this 28 day of January, 2008.

Ana M. Viamonte Ros, M.D., M.P.H.
State Surgeon General



Counsel for Petitioner:

Michael G. Lawrence, Jr.

Assistant General Counsel

FBN: 0011265

Department of Health

Prosecution Services Unit

4052 Bald Cypress Way, BIN #C-65

Tallahassee, Florida 32399-3265

MGL/tlr

STATE OF FLORIDA
BOARD OF NURSING

Final Order No. DOH-09-0696-S-MOA
FILED DATE - 4-28-09
Department of Health
By: Rachel R. [Signature]
Deputy Agency Clerk

DEPARTMENT OF HEALTH,

Petitioner,

vs.

Case No.: 2008-14294
License No.: RN 9260431

ROSA ALEX GILBERT,

Respondent.

FINAL ORDER

THIS CAUSE came before the BOARD OF NURSING (Board) pursuant to Sections 120.569 and 120.57(4), Florida Statutes, on April 3, 2009, in Dania, Florida, for the purpose of considering a settlement agreement (attached hereto as Exhibit A) entered into between the parties in this cause. Upon consideration of the settlement agreement, the documents submitted in support thereof, the arguments of the parties, and being otherwise fully advised in the premises, it is hereby

ORDERED AND ADJUDGED that the settlement agreement as submitted be and is hereby approved and adopted in toto and incorporated herein by reference. The costs are \$672.83. Accordingly, the parties shall adhere to and abide by all the terms and conditions of the settlement agreement.

This Final Order shall take effect upon being filed with the Clerk of the Department of Health.

DONE AND ORDERED this 16 day of April,
2009.

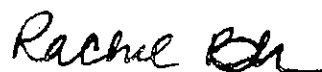
BOARD OF NURSING



Rick Garcia, MS, RN, CCM
Executive Director for
Jessie Colin, RN, PhD,
Chair

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the
foregoing Final Order has been provided by U.S. Mail to ROSA ALEX
GILBERT, 227 Gilbert Court, Florence AL 35630; and by interoffice
delivery to and by interoffice delivery to Lee Ann Gustafson,
Senior Assistant Attorney General, Department of Legal Affairs,
PL-01 The Capitol, Tallahassee FL 32399-1050, Walter Widener,
Assistant General Counsel, Department of Health, 4052 Bald
Cypress Way, Bin C-65, Tallahassee, Florida 32399-3265 this
26 day of April, 2009.



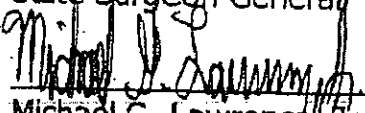
Deputy Agency Clerk

WHEREFORE, the Petitioner respectfully requests that the Board of Nursing enter an order imposing one or more of the following penalties: permanent revocation or suspension of Respondent's license, restriction of practice, imposition of an administrative fine, issuance of a reprimand, placement of the Respondent on probation, corrective action, refund of fees billed or collected, remedial education and/or any other relief that the Board deems appropriate.

SIGNED this 22nd day of December

2008.

Ana M. Viamonte Rose, M.D., M.P.H.
State Surgeon General


Michael G. Lawrence Jr.

Assistant General Counsel
DOH Prosecution Services Unit
4052 Bald Cypress Way, Bin C-65
Tallahassee, Florida 32399-3265
Florida Bar Number 0011265
(850) 245 - 4640 Telephone
(850) 245 - 4683 Facsimile

FILED
DEPARTMENT OF HEALTH
DEPUTY CLERK
CLERK *Rachel Brooks*
DATE *12-22-08*

/TLD

PCP:
PCP Members:

L KIRKPATRICK
S BOWEN
12/19/08

NOTICE OF RIGHTS

Respondent has the right to request a hearing to be conducted in accordance with Section 120.569 and 120.57, Florida Statutes, to be represented by counsel or other qualified representative, to present evidence and argument, to call and cross-examine witnesses and to have subpoena and subpoena duces tecum issued on his or her behalf if a hearing is requested.

NOTICE REGARDING ASSESSMENT OF COSTS

Respondent is placed on notice that Petitioner has incurred costs related to the investigation and prosecution of this matter. Pursuant to Section 456.072(4), Florida Statutes, the Board shall assess costs related to the investigation and prosecution of a disciplinary matter, which may include attorney hours and costs, on the Respondent in addition to any other discipline imposed.